

3/23/05



103984

**HALEY &
ALDRICH****HEXCEL**

do some sort of de minimis settlement
for parties on tribes - possible?

Hexcel - looking to be
BDA by end of '05
Lodi, New Jersey

Presentation to USEPA, March 23, 2005

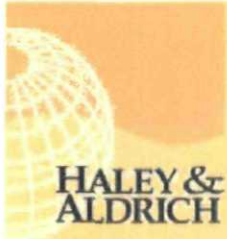
John A. Rhodes, P.E.

Haley & Aldrich, Inc

Parsippany, New Jersey

* write technical letter
on Hexcel's presentation
memo to Kedar

* look up Steppen on SR



Outline of Presentation

1. PCBs are only contaminant of concern.
2. Hexcel has moved to aggressively remediate on-site contamination and to limit off-site concerns.
3. Hexcel has not contributed to the Passaic River contamination:
 - Low flow, low sediment loading and low contaminant loading in the Saddle River.
 - Hexcel site is a significant distance from the Passaic.
 - No Further Action determination for sediment at Hexcel is sought.

1. Contaminants of Concern

a. Saddle River at Hexcel

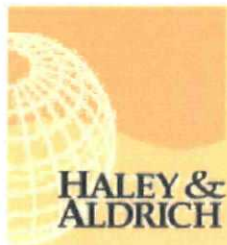
■ PCBs

- limited and localized detections (as discussed further below)

■ Chlorobenzene, some indications of benzene, dichlorobenzenes, ethyl benzene, and toluene at property edge

- no evidence of chlorobenzene in Passaic (see following chart)
- will be eliminated by ongoing remediation and natural degradation

■ No other contaminants of concern



Contaminants of Concern

b. Lower Passaic River

Pesticides

Hexachlorobenzene
alpha HCH
beta HCH
gamma HCH
Heptachlor
Aldrin
Oxychlordane
gamma-Chlordane (trans-)
alpha-Chlordane (cis-)
o,p'-DDE
p,p'-DDE
trans-Nonachlor
cis-Nonachlor
o,p'-DDD
p,p'-DDD
o,p'-DDT
p,p'-DDT
Mirex
Heptachlor Epoxide
alpha-Endosulphan (I)
Dieldrin
Endrin
beta-Endosulphan (II)
Endrin Aldehyde
Endosulphan Sulphate
Endrin Ketone
Methoxychlor

Dioxin/Furans

2,3,7,8-TCDD
1,2,3,7,8-PeCDD
1,2,3,4,7,8-HxCDD
1,2,3,6,7,8-HxCDD
1,2,3,7,8,9-HxCDD
1,2,3,4,6,7,8-HpCDD
OCDD
2,3,7,8-TCDF
1,2,3,7,8-PeCDF
2,3,4,7,8-PeCDF
1,2,3,4,7,8-HxCDF
1,2,3,6,7,8-HxCDF
1,2,3,7,8,9-HxCDF
2,3,4,6,7,8-HxCDF
1,2,3,4,6,7,8-HpCDF
1,2,3,4,7,8,9-HpCDF
OCDF

PCBs

All 209 congeners (in 159 domains) for the New York program; a somewhat abbreviated list to be determined for the New Jersey program

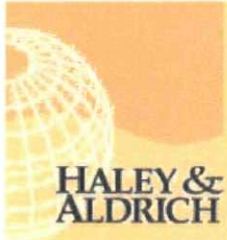
PAHs

Naphthalene
Biphenyl
Acenaphthylene
Acenaphthene
Fluorene
Phenanthrene
Anthracene
Fluoranthene
Pyrene
Benz[a]anthracene
Chrysene
Benzo[b,j,k]fluoranthene
Benzo[e]pyrene
Benzo[a]pyrene
Perylene
Dibenz[a,h]anthracene
Indeno[1,2,3-cd]pyrene
Benzo[g,h,i]perylene
C1 Naphthalenes
C2 Naphthalenes
C3 Naphthalenes
C1
Phenanthrenes/Anthracenes

Heavy metals

Total Mercury
Total Cadmium
Dissolved Methyl Mercury
Dissolved Mercury
Dissolved Cadmium
Dissolved Lead

From CARP



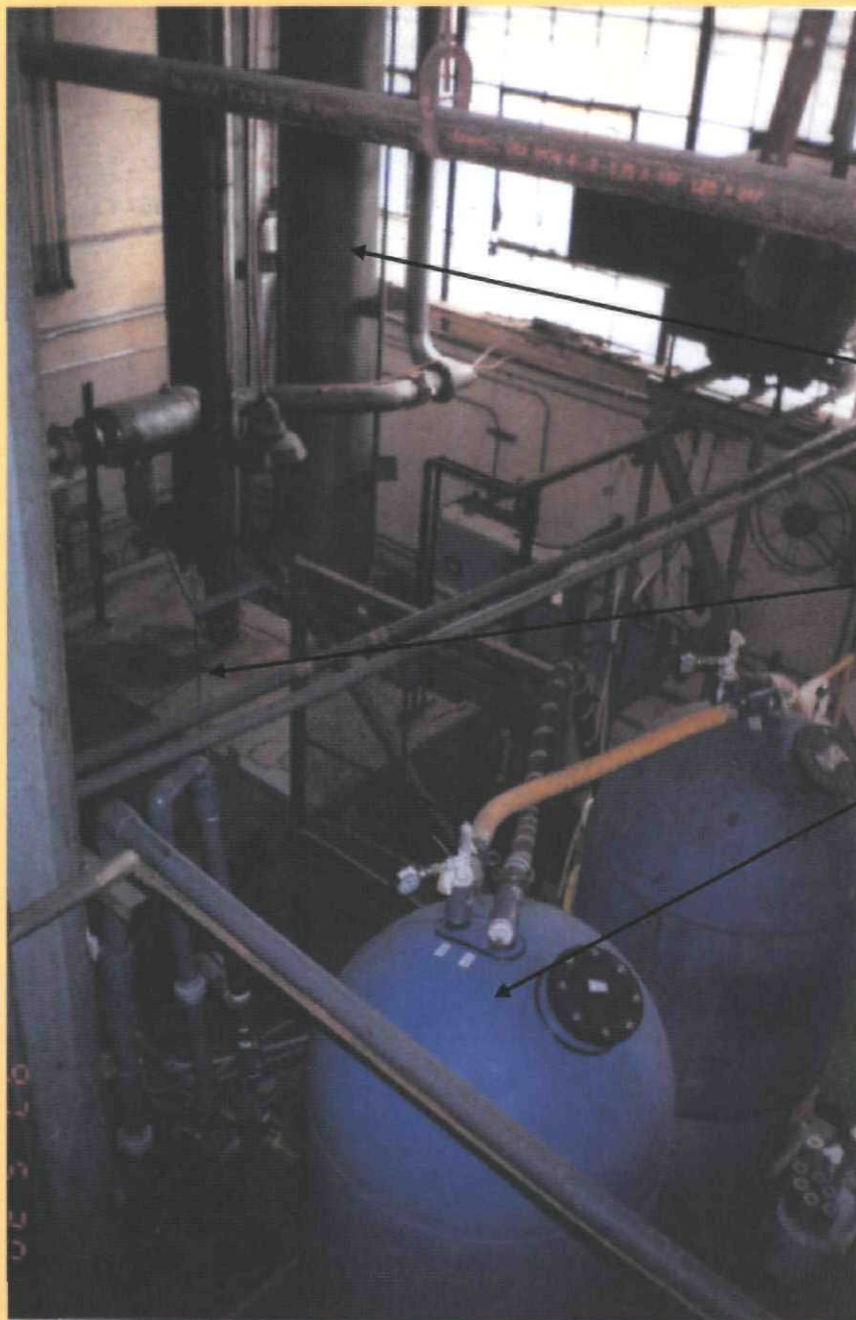
2. Significant Remediation Completed per NJDEP Approved Remedial Action Workplan

- Interim pump & treat
- Property acquisition
- Building demolition and tank closure
- Industrial sewer removal
- PCB soil removal
- Two phase extraction to remove chlorinated organics
- Follow-up PCB soil removal
- Enhanced biological polishing of groundwater, if necessary

→
Currently
here



HALEY &
ALDRICH

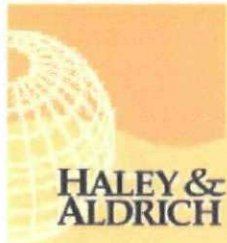


Interim Pump & Treat (1987 – 1997)

Air Stripper

Catalytic Oxidizer

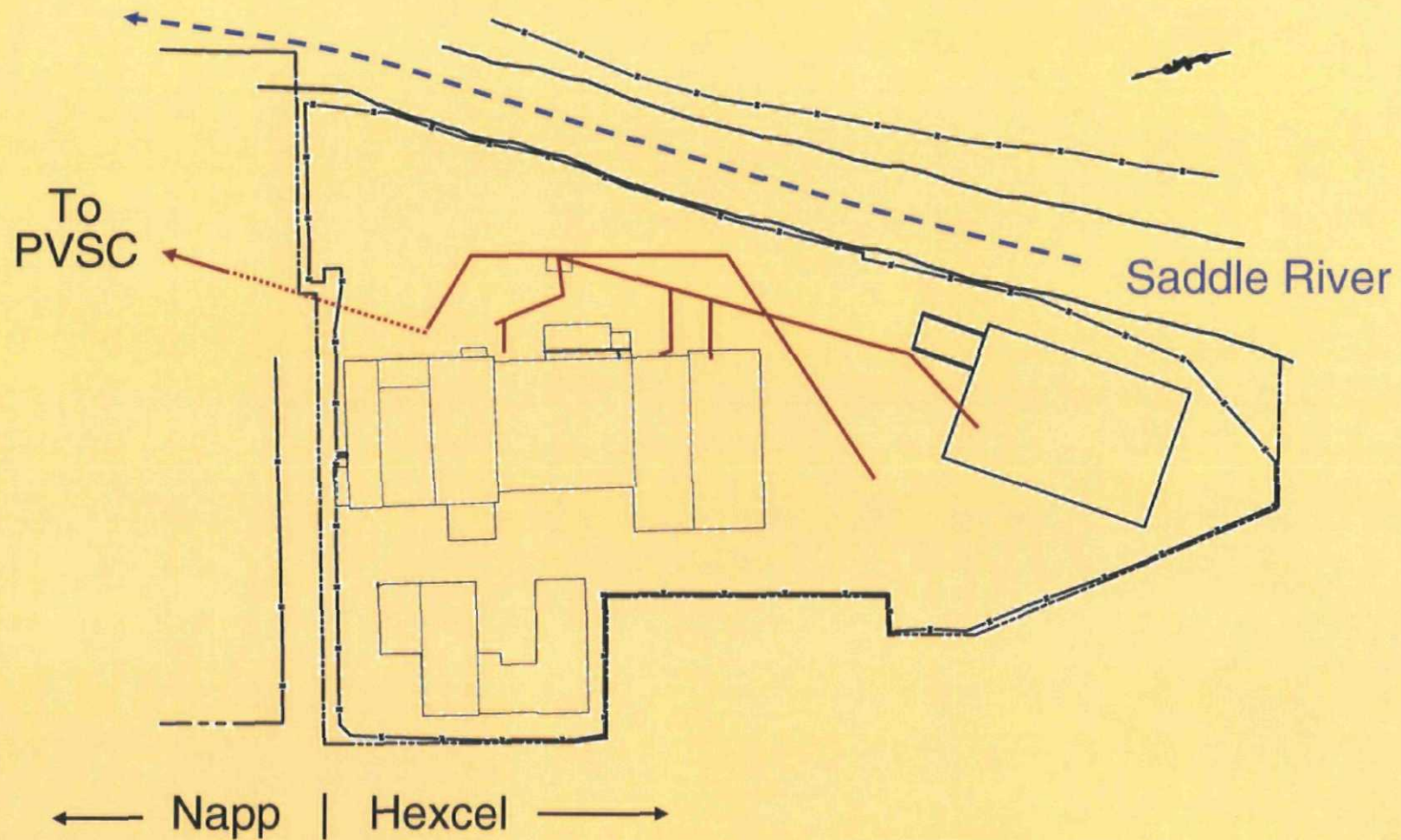
Activated Carbon
vessels



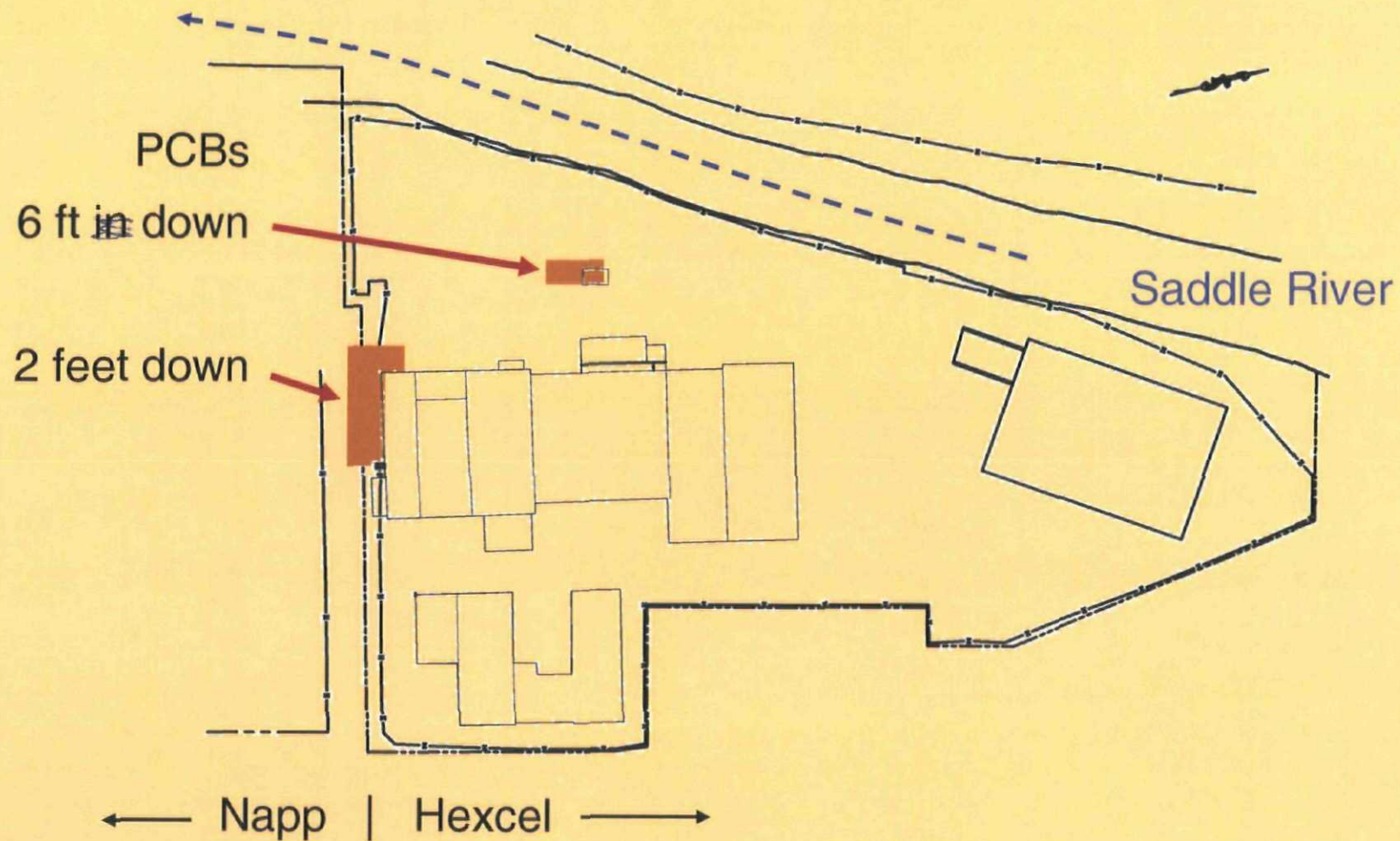
Property Acquisition Facilities Demolition and Closure

- In 1997, Hexcel re-acquired the Lodi property from Fine Organics.
 - Purpose was to facilitate remediation efforts.
- In 1998, Hexcel demolished former buildings on the Lodi property.
 - Allowed access to all areas needing remediation.
 - All tanks and process equipment were removed.

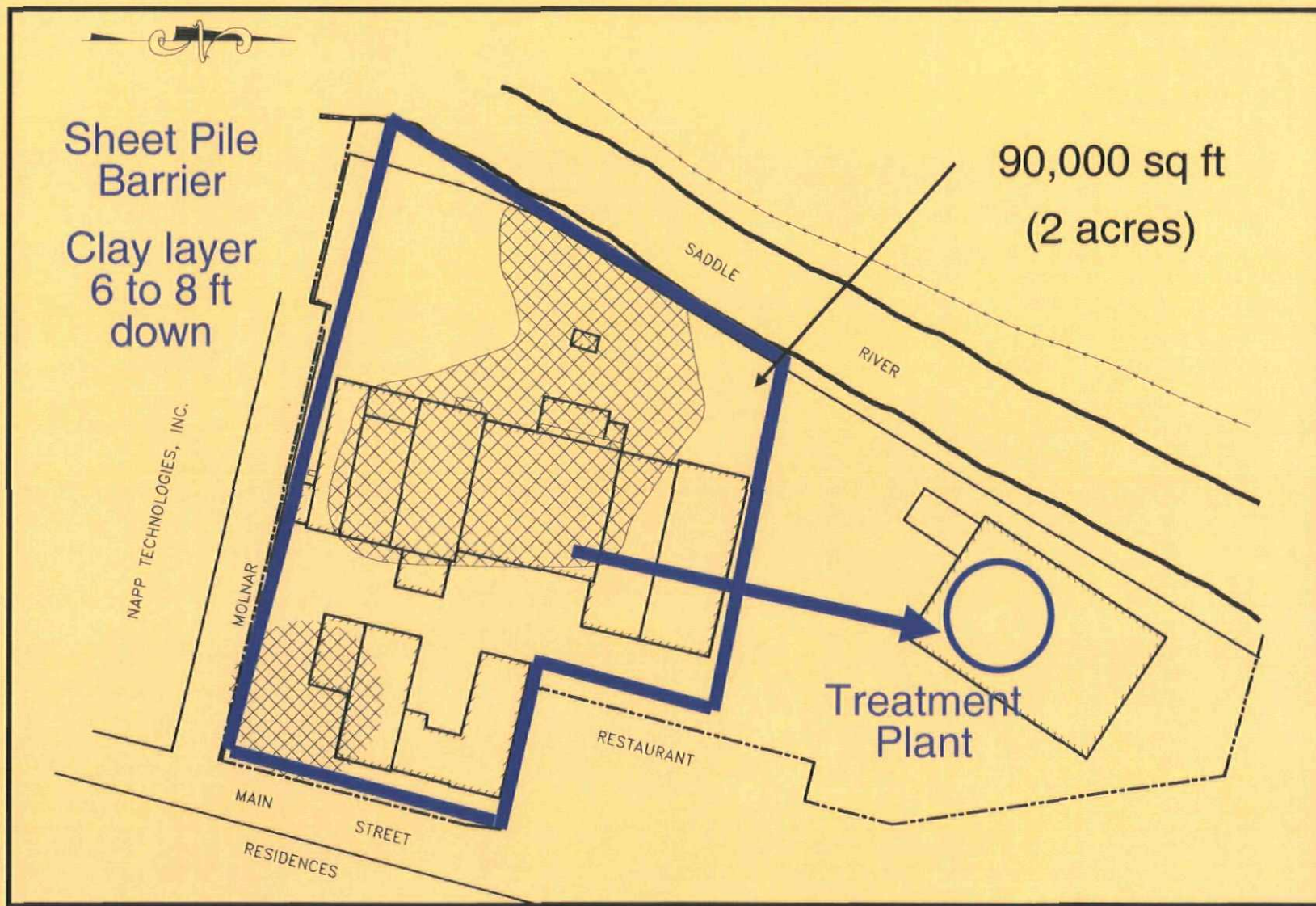
Industrial Sewer Removal (2003)



PCB soil removal (2002 and 2003)



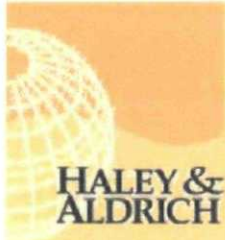
Two Phase Extraction to Aggressively Remove Chlorinated Organics



Two Phase Extraction Treatment Plant

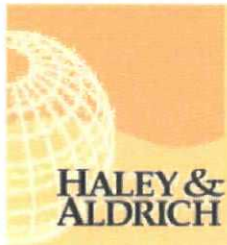


Removing 77 pounds per day
(more than 8 gals product per day)
Completion in under 2 years



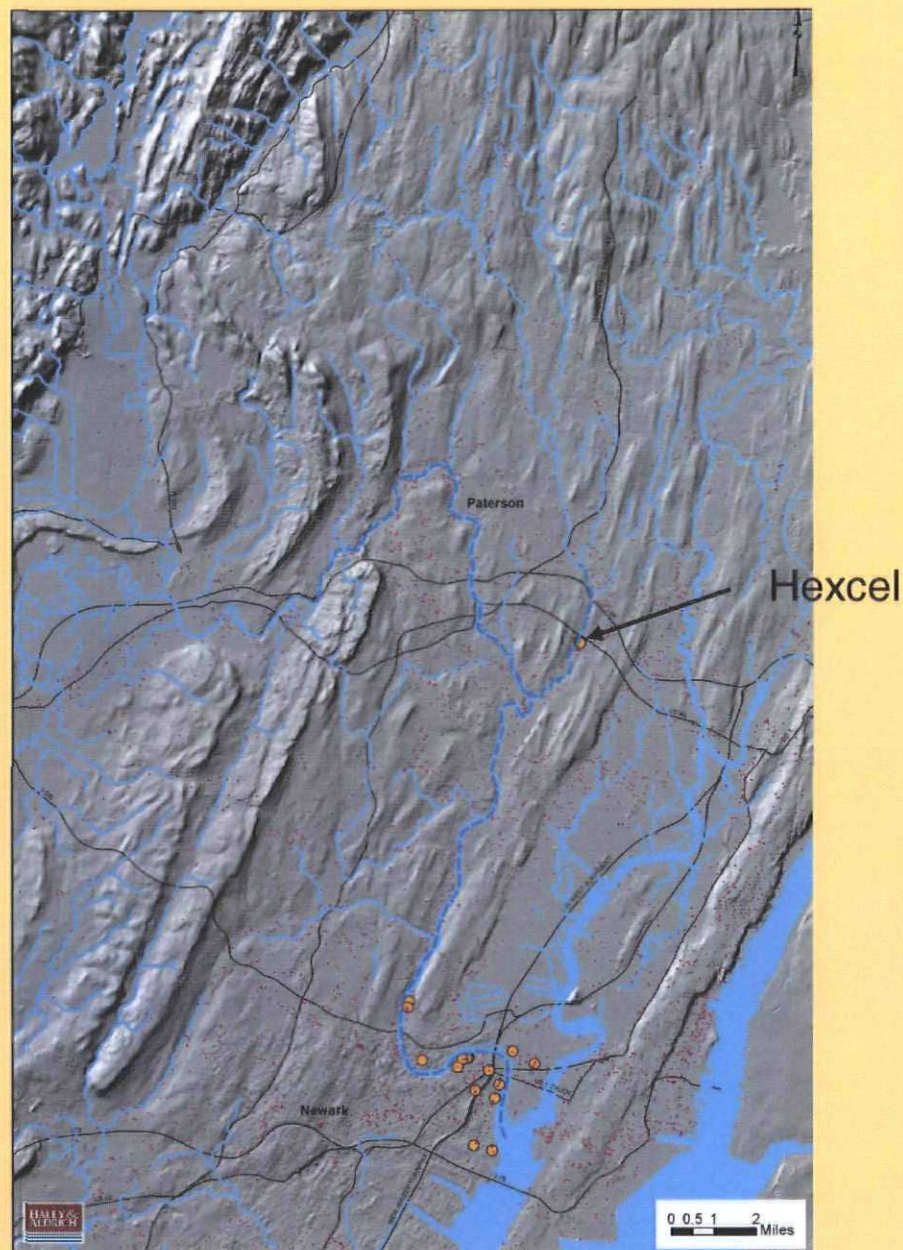
3. Hexcel has not contributed to contamination in the Passaic River

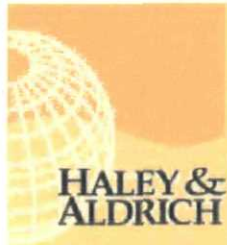
- Over 4,170 known contaminated sites are in the Passaic River catchment area.
- Hexcel is over four channel miles from the confluence with the Passaic.
- Saddle River is not a significant source of contaminants to the Passaic based on Army Corp studies.
 - Small sediment loading from the Saddle River
 - Low PCBs in sediment in the Saddle River before it empties into the Passaic
- Only limited and well defined sediment contamination is potentially related to Hexcel.
 - PCB not detected in most shallow sediment samples; limited and localized detections in deeper sediments; concentrations abate not far from the facility



4,170 Known Contaminated Sites

DEP will be putting together a list of all KCS's with PCBs in near future





Hexcel is a
Significant
Distance
from the
Lower
Passaic.



Hexcel

4 channel miles to
Passaic

24 channel miles to
Newark

Saddle River is not a Significant Source of Contaminants to the Passaic



Low Flow

Passaic Flow 10X
Saddle River Flow at
Confluence

Low Sediment Loading

"...results indicate a
low flow potential for
sediment movement in
the project area
[Saddle River]"

- Army Corp

Low Contaminant Loading

Total PCBs in Saddle
at confluence near
detection level (0.02
mg/kg) and below all
screening criteria

* USACE did flow
runoff studies of SR (186)
- look up this info

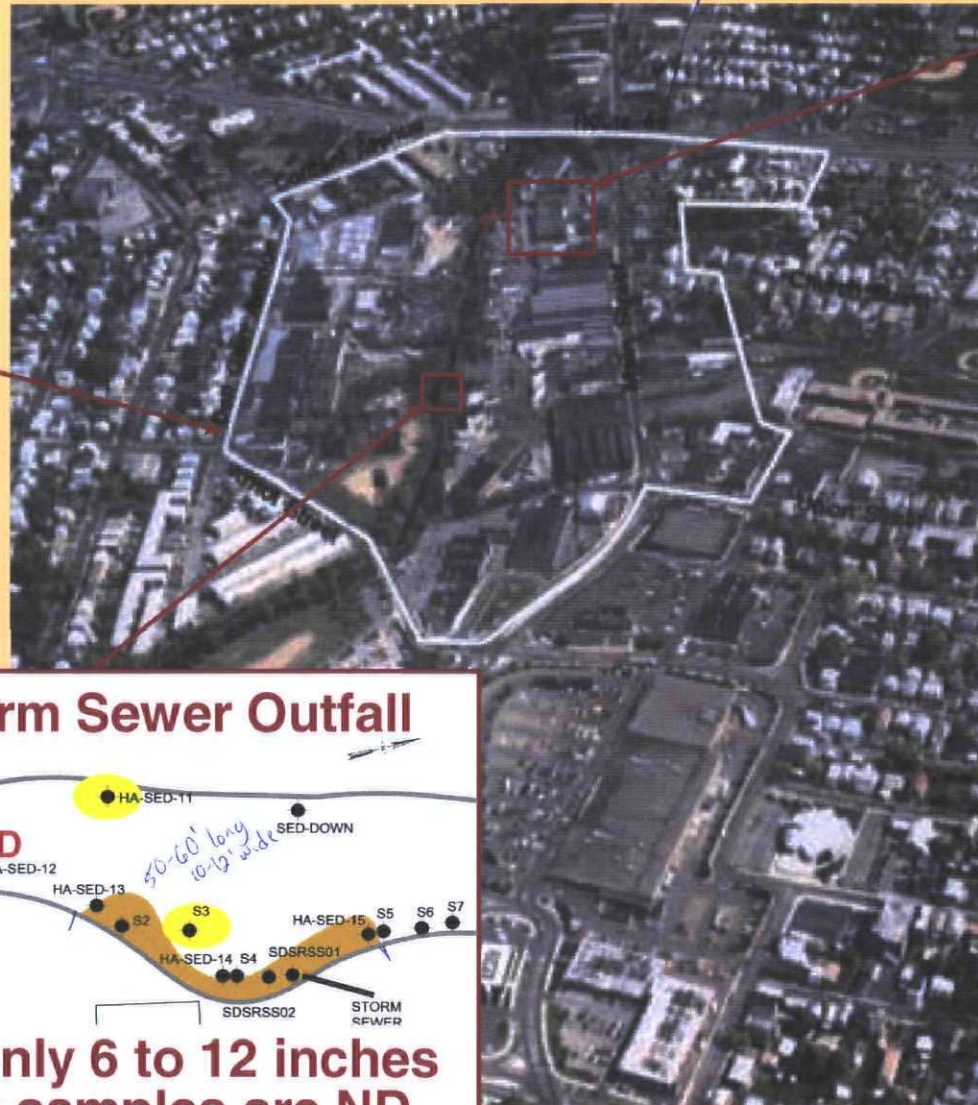
Only Limited Sediment Contamination

BDA already started construction but not necessarily state oversight & Ask Steve for info

Hexcel

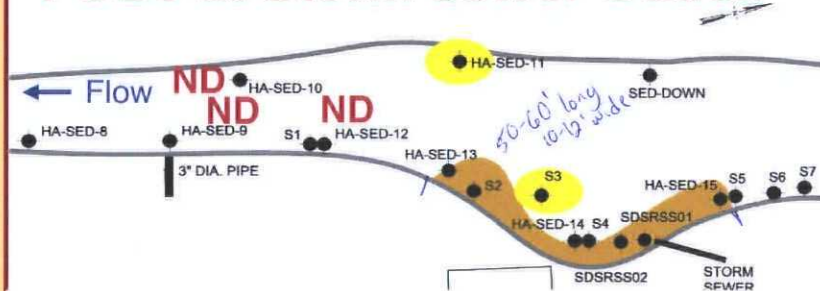
- 95 sediment samples within brownfields area
- 2 toxicity samples
- 20 surface water samples
- Sediment and surface water samples by Army Corp outside of project area

Brownfields area

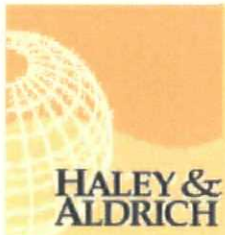


900 rotation of SR where pipes join it

PCBs at Storm Sewer Outfall



**Detections only 6 to 12 inches
0 to 6 inch samples are ND**



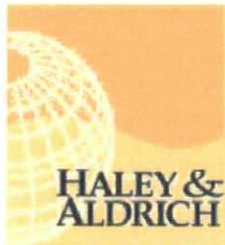
Criteria for Evaluation of Sediment and Surface Water Analytical Results

Sediment

- NJDEP Freshwater Sediment Screening Guidelines Lowest Effects Level (LEL)
- USEPA Equilibrium Partitioning (EqP) Sediment Quality Benchmarks
- USEPA OSWER Ecotox Thresholds (Ecotox)
- Ontario Provincial Sediment Quality Guidelines, Severe Effects levels (SEL)

Surface Water

- New Jersey Surface Water Quality Standards
- Federal Ambient Water Quality Criteria



No Further Action in Saddle River

- No toxicological response is indicated in toxicity testing (100 % survival).
- PCBs are not detected in surface water.
- Chlorobenzene is well below surface water quality standards.
- PCBs potentially related to Hexcel are not-detected in recent sediment samples in biologically active zone (0-6 inches).
- Remediation will eliminate low levels of chlorobenzene in sediments.
- Hexcel is currently requesting from the NJDEP "No Further Action" for sediments and surface water in the Saddle River.

Summary

- Contaminant of concern limited to PCBs
- Hexcel remediation is well along with major components completed.
- Hexcel has not contributed to contamination in the Passaic River.
- No Further Action requested from the NJDEP for sediments and surface water in the Saddle River

